

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

<b>Deming Zhour and Theresa Change,</b>	)	
	)	
<b>Plaintiffs</b>	)	<b>Honorable William J. Hibbler</b>
<b>v.</b>	)	
	)	<b>Case Number: 07 CV 6524</b>
<b>Kaible Corporation and Kai Jiang</b>	)	
	)	
<b>Defendants.</b>	)	
	)	

**DEFENDANTS' AGREED MOTION FOR ADDITIONAL TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendants, Kaible Corporation and Kai Jang (collectively, "Defendants"), move for additional time to answer or otherwise plead to plaintiff's complaint. In support of their motion, Defendants state as follows:

1. Kaible Corporation was served with the summons and complaint on December 5, 2007. Therefore, an appearance and responsive pleading was due on or before December 26, 2007. Defendant Kai Jang was purportedly served on November 11, 2007, and his answer was purportedly due December 10, 2007. On December 14, 2007, counsel timely filed appearances for both defendants.

2. Defendants request to and including January 31, 2008 to answer or otherwise plead to Plaintiff's complaint because the additional time is necessary for defense counsel to determine how to proceed in this matter. Defendant Kai Jiang resides in Shanghai China. In addition, Defendant Kaible Corporation operates from Shanghai. Obtaining information from the Defendants to formulate a defense has been problematical given the distance and time change.

3. This is Defendants' first request for an extension.

4. Defendants' attorneys have spoken with Plaintiff's counsel about this request, and Plaintiff's counsel have advised that they have no objection to Defendants' request for extension.

WHEREFORE, Defendants, Kaible Corporation and Kai Jiang, hereby respectfully request that this Court enter an order granting them to and including January 31, 2008 to answer or otherwise plead to Plaintiff's complaint.

Respectfully submitted,

KAIBLE CORPORATION AND KAI JIANG,  
Defendants

By: s/ Stephen C. Voris  
One of Their Attorneys

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